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Attorneys for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR APPROVAL  
OF A POWER PURCHASE AGREEMENT  
WITH PLEASANT VALLEY SOLAR, LLC.

Case No. IPC-E-22-29

**CITY OF BOISE CITY'S  
PETITION TO INTERVENE**

COMES NOW, the city of Boise City, herein referred to as "Boise City," and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utilities Commission (IDAPA 31.01.01.71 – 31.01.0.73), the Application filed on November 14, 2022, and the Notice of Application, Order No. 35658 hereby requests to intervene in this matter and to appear and participate as a party. As grounds, Boise City states as follows:

1. The name and address of this Intervenor is:

City of Boise City  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, ID 83701-0500

2. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be sent to the following:

Darrell Early  
Ed Jewell  
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Pursuant to Order No. 35375, Commission Rules 61 and 62 are suspended and all service in this docket, except for voluminous discovery-related documents, is to be completed electronically. If the Commission decides to return to hard copy service during this docket, Boise City requests hard copies of pleading, testimony, and briefs only. All other production requests, response, notices, Commission orders and other filings may be served on Boise City via electronic mail in accordance with Rule 63 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.063).

3. Boise City is a Municipal Corporation organized under the laws of the state of Idaho.


4. Boise City has a direct and substantial interest in representing its constituents, who are customers of Idaho Power Company ("Idaho Power") and will be impacted by the decisions made in this docket. Boise City is also a large Idaho Power customer with Schedule 7, 9, and 19 electric service accounts. Boise City also maintains multiple solar panel installations and net metering facilities, such as those located at the Twenty Mile South Farm Administration and Maintenance Building. Additionally, Boise City is an Idaho Power customer with expressed clean energy preferences. This proceeding may directly impact Boise City's ability to meet its clean

energy goals through utility-scale renewable resources. Without the opportunity to intervene herein, Boise City would not have the direct means of ensuring the outcome of this proceeding positively impacts the environmental, health, and economic concerns of Boise City and its citizens. Granting Boise City's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

5. Boise City intends to fully participate in this matter as a party and appear in all matters as appropriate. The nature and quality of Boise City's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, Boise City may present evidence, call and examine witnesses, and present argument.

WHEREFORE, the city of Boise City, respectfully requests that this Commission grant this Petition to Intervene and issue a timely order as set forth in IDAPA 31.01.01.075.

DATED this 17th day of January 2023.

  
\_\_\_\_\_  
Ed Jewell,  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 17th day of January 2023, served the foregoing documents on all parties of record as follows:

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Ste. 201-A  
Boise, ID 83714  
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- Facsimile
- Electronic
- Other: \_\_\_\_\_

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